

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUIS DREYFUS CORPORATION,

07 CV 6622 (WHP)

Plaintiff,

NOTICE OF MOTION

-against-

M/V CMA CGM CORTES, her engines,
boilers, tackle, etc., ALPHA
SHIPMANAGEMENT GMBH & CO., KG, ALPHA
SHIP GMBH & CO. KG MS "NEPTUN",
COMPANIA SUD AMERICANA DE VAPORES S.A.
(C.S.A.V.),

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Declaration and the exhibits thereto attached, Memorandum of Law, and all the prior pleadings and proceedings in this action, defendant COMPANIA SUD AMERICANA DE VAPORES S.A. (CSAV) will move the Court before the Honorable William H. Pauley at the Courthouse located at 500 Pearl Street, New York, New York, for an order, pursuant to Rule 12 of the Federal Rules of Civil Procedure, dismissing the action on forum non conveniens grounds, and granting to CSAV such other and further relief as the Court may deem just and proper.

Dated: New York, New York
April 11, 2008

MAHONEY & KEANE, LLP
Attorneys for Defendant
COMPANIA SUD AMERICAN DE
VAPORES, S.A.

By:


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